



**Maui Economic Opportunity, Inc.
Early Childhood Services**

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September 22, 2013

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street
Washington, DC 20554

Re: Request for Waiver of Form 471 Filing Deadline for Funding year 2013-2014

Contact:

Name: Patrick O'Rourke
MEO Head Start
Address: 99 Mahalani Street, Wailuku, HI 96793
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Billed Entity Number: 16043126
Form 471 Application Number: 909763
CC Docket No. 02-6

Dear Ms. Dortch:

We are writing to respectfully request the FCC to grant a waiver of the Funding Year 2013-2014 Form 471 deadline so that MEO Head Start's Form 471 E-rate application will be considered as having been filed within the 'window.'

We recognize that we are solely responsible for missing the deadline but we believe that this petition demonstrates particular facts and special circumstances sufficient to warrant a departure from the general rule established in the FCC Order. In light of this, we respectfully ask that the FCC grants MEO Head Start's petition to waive the deadline.

MEO Head Start was founded in 1965 as a part of President Lyndon Johnson's War on Poverty. MEO Head Start serves the neediest of the needy, the poorest of the poor families here in Maui County. 100% of our children are in the USDA subsidized breakfast and lunch program.

The effects of poverty are evident in Maui County. Residents here are dealing with the same problems faced by impoverished communities all over the United States: high unemployment, limited access to proper healthcare, a failing educational system, drug, alcohol and spousal abuse, the dissolution of the nuclear family and the dwindling resources needed to address all these inequities.

In addressing these challenges, recent studies have shown that the greatest impediment to early childhood learning is poverty. Specifically, the "stress" caused by poverty.

In the Head Start whole family approach, our Family Case Managers and teachers meet with parents and children in their home environment to identify the stresses challenging these families. Once identified, these challenges are addressed and we help our families get access to community resources. In conjunction to these services is the quality of our classrooms. Walk into one of our 14 schoolhouses and you will be struck the genuine joy and laughter, and the sense of safety that surrounds you. Every day, in each one of our schoolhouses, preschoolers are learning the necessary skills to be successful in life and in school.

The Promise of Community Action

Community Action changes people's lives, embodies the spirit of hope, improves communities, and makes America a better place to live. We care about the entire community, and we are dedicated to helping people help themselves and each other.



In our classrooms you will also find a diversity staff that reflects our ethnic blending here on Maui, many of whom are also former parents of Head Start students. What is truly striking about this teaching staff is how much “aloha” these amazing mentors and guides have for the children they teach. We are one big “Ohana” (Hawaiian for family) in Maui County, and the love that we have for our children is deep, strong, abiding, patient and profound.

This “aloha” is a part of everything we do and is our greatest strength. It is the foundation of our success and at the heart of everything we do as a Head Start program on Maui. We realize the significant impact early intervention has on child development and take our responsibilities seriously.

MEO Head Start missed the filing window due to several challenges including:

- Preparation for the Office of Head Start Federal Review during the week of January 14 – 18, 2013.
- Request to reduce funded enrollment from 298 to 278 due to high operating costs without additional federal funding to support the budget. This request was submitted in February 2013.
- Sequestration impact which included an additional 20 slot reduction bringing funding enrollment to 258, and reduction of work force by two teaching staff and one Family Case Manager. Notice of sequestration was received on March 1, 2013.

These extraordinary and overwhelming events overshadowed our USAC application process and with all of the changes in duties and responsibilities caused by all of the above, it fell thru the cracks. Being the new USAC administrator, by the time I realized we had an impending deadline for our application for Erate funds, there was no way we could follow proper filing protocol and meet the necessary timelines.

In speaking with the good and helpful folks at USAC, it was their advice to follow the normal application procedures even if it placed us outside the filing window deadlines and if necessary apply for a waiver of same.

We understand as noted by the Court of Appeals for the D.C. Circuit, that agency rules are presumed valid, and that “an applicant for a waiver faces a high hurdle even at the starting gate.” We ask you to consider whether a strict adherence to the general rule is consistent with the public interest in this case, and we ask you to consider the devastating effects the loss of these funds would have on the families and children we serve here in Maui County, especially with the loss of over \$105,000.00 in sequester funds this year. We respectfully ask the Commission to take into account considerations of hardship, equity, and more effective implementation of overall policy on this individual basis.

The poverty here on Maui is real, the needs are real, and the stress it creates in our families and their little ones is real. The MEO Head Start program has profound and lasting effects on the lives of those we serve. We do great work and it makes a difference in our keiki’s lives and in our community. A waiver will allow us to better meet those needs and deservedly serves the public interest.

Thank you for your time, your patience, your compassion and your consideration of the great work we do here on Maui. Aloha and Mahalo!

Sincerely,

Patrick O’Rourke
Facilities Manager